

**Your  
Seattle  
City Light**

Randall W. Hardy, Superintendent  
Charles Royer, Mayor

**May 24, 1985**

Mr. Michael Dawda, District Engineer  
Northwest Regional Office  
State of Washington  
Department of Ecology  
4350 - 15th N.E.  
Redmond, Washington 98052

Dear Mr. Dawda:

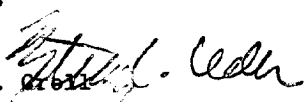
This letter is to request that our NPDES Permit Variance for our Lake Union Steam Plant be renewed.

As you know, the plant cannot meet the water quality criteria specified in WAC 173-201-045(c)(iv) (no temperature increase allowed). The variance granted by the Washington Department of Ecology on September 16, 1983 expired on June 30, 1984. We are requesting a variance for the period June 3, 1985 to June 14, 1985 for the purpose of conducting a trial burn to establish air quality parameters prior to beginning the design phase of retrofitting the Lake Union Steam Plant to meet EPA criteria for HEB (High Efficiency Boilers). Retrofitting the Lake Union Steam Plant is, as you know, one of the three lead alternatives for disposal of our PCB-contaminated Bunker Fuel Oil. This test burn will be done with diesel fuel oil that is not contaminated with PCB. The actual burn would be for only an eight hour period sometime during these several weeks. Seattle City Light understands that proceeding with other test burns or the actual destruction of PCB-contaminated fuel oil over an extended period would each require a separate variance from DOE.

We will, of course, abide by all applicable variance and permit conditions. We are in the process of obtaining from the Departments of Fisheries and Game permission for this brief test.

We would very much appreciate your prompt consideration of this matter. We hope to start our test burn as soon as possible so that we can clean up our PCB problem as quickly as possible. Ideally, we would like to start the burn on June 3. Thank you for your assistance in this matter.

Sincerely,

  
Timothy C. Croll  
Acting Director, Environmental Affairs Division

cc: Miller      Campion  
Sihon      Kikada  
Groner      EAD 942.3/404.3  
Croll      File

TCC:mbm

cc: Robert Gerke, Washington Department of Fisheries  
Ted Molarr/Gary Engman, Washington Department of Game

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